

Magistrate Judge Brian A. Tsuchida

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UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBERT RYAN POWELL,

Defendant.

CASE NO.

MJ 15-274

COMPLAINT for VIOLATION

Title 18, U.S.C. Section 2423(a)

BEFORE, BRIAN A. TSUCHIDA, United States Magistrate Judge, U. S.  
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Transportation of a Minor with Intent to Engage in Prostitution)**

Beginning on or about August 1, 2014, through August 31, 2014, in King County,  
within the Western District of Washington, and elsewhere, ROBERT RYAN POWELL  
did transport JF-1, a juvenile female, in interstate and foreign commerce, from  
Washington State, to San Jose, California, with the intent that JF-1 engage in prostitution  
or sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

COMPLAINT/POWELL- 1  
USA02015R00320

UNITED STATES ATTORNEY  
700 STEWART STREET, SUITE 5220  
SEATTLE, WASHINGTON 98101  
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**COUNT 2**

**(Transportation of a Minor with Intent to Engage in Prostitution)**

Beginning on or about August 1, 2014, through August 31, 2014, in King County, within the Western District of Washington, and elsewhere, ROBERT RYAN POWELL did transport JF-2, a juvenile female, in interstate and foreign commerce, from Washington State, to San Jose, California, with the intent that JF-1 engage in prostitution or sexual activity for which any person can be charged with a criminal offense.

All in violation of Title 18, United States Code, Section 2423(a).

And the complainant states that this Complaint is based on the following information:

1. I, Maurice Washington, am employed as a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), assigned to the Seattle Field Division. I have been a TFO with the Child Exploitation Task Force for the past 4 years, and I have been a law enforcement officer for over 24 years with the Seattle Police Department. The focus of the task force is to combat children and young women from being targeted for sex trafficking, to stop or disrupt the controllers/pimps that are trafficking the juveniles and adult men and women, and to rescue/remove those that are already being victimized.

2. I have been involved in numerous undercover operations during which I was an undercover officer targeting street level prostitutes and escorts that utilize internet and phone communications/texting for business. I have also been involved in long term and short term operations where I was an undercover officer posing as a pimp. I was in direct contact with several pimps and prostitutes during these operations and I was able to gain valuable intelligence information about these illegal criminal organizations.

3. The information contained herein is based upon my own knowledge, as well as upon court documents, police reports, investigations conducted by others, and the details related to me by others familiar with this matter. I have not included in this complaint all of the information known to me about this case, but have included only those facts pertinent to establish probable cause that ROBERT RYAN POWELL has

1 committed the crime of Interstate Transportation of a Minor for Purposes of Prostitution,  
2 in violation of Title 18, United States Code, Section 2423(a).

3 **Summary of Investigation**

4 4. In late August 2014 to the present, I have been investigating the defendant  
5 ROBERT RYAN POWELL for interstate transportation of minors and adults with the  
6 intent to engage in prostitution. My investigation began on August 23, 2014, when I was  
7 contacted by Deanna Clark who reported that her daughter, 17 year old female (JF-1),  
8 had been taken from the Seattle area to California and was being forced to prostitute by a  
9 pimp. Ms. Clark provided me JF-1's cell phone number and I was able to communicate  
10 with her over the next few days.

11 5. During my telephone conversations with JF-1, she stated she had been  
12 taken down to San Jose, California, by a pimp (subsequently identified as ROBERT  
13 RYAN POWELL) who was forcing her to prostitute on what she called "ho stroll" which  
14 I understood to mean trying to obtain customers by walking on a street known for  
15 prostitution. JF-1 said the pimp made her wear high heel shoes that were too small for  
16 her feet, a pair of shorts that exposed her butt, and a shirt that exposed her stomach and  
17 parts of her chest. JF-1 said that her street sister, "Sunshine," (JF-2) had also been taken  
18 from Washington State to San Jose, California with her and that "Sunshine" was also  
19 being forced to prostitute by walking on the prostitution track.

20 6. I advised JF-1 to call 911 which JF-1 was initially reluctant to do because  
21 she wanted to retrieve her belongings from POWELL's car first.

22 7. On August 25, 2014, JF-1 called to inform me that the pimp had left them  
23 and she was going to call the police. JF-1 explained that when she and JF-2 woke up, the  
24 pimp and all his belongings were gone. I then spoke to JF-2 and obtained her full name  
25 and date of birth. JF-2 was then 16 years old.

26 8. I learned that the San Jose Police had responded to the Hotel Elan, 1215  
27 South 1<sup>st</sup> Street, San Jose, California, and taken JF-1 and JF-2 into protective custody.  
28

1 Subsequently JF-1 and JF-2 were returned to the Seattle area. Upon their return, I  
2 interviewed JF-1 on three separate occasions and JF-2 on two occasions.<sup>1</sup>

3 9. In summary, JF-1 told me that she has been involved in prostitution since  
4 she was 15 years old. She met POWELL on the dating website "tagged.com" a couple of  
5 months before going to California. Though she was only 17 years old, JF-1 listed herself  
6 as 21 years old on tagged.com. However, when she met JF-1 she told him she was 18  
7 years old.<sup>2</sup>

8 10. JF-1 knew POWELL as "Fresh the P" or "Fresh." JF-1 stated that she  
9 understood "P" to mean pimp. She met him in person on approximately August 21,  
10 2014. JF-1 said that POWELL had told her that he had done time in prison for pimping  
11 and had only been out of prison for eight (8) months.

12 11. According to JF-1, on August 21, 2014, shortly after she and JF-2 met  
13 POWELL, they got a room at the Studio 6 Motel, Mountlake Terrace, Washington.  
14 POWELL told JF-2 that he was 32 years old and asked JF-1 and JF-2 for identification.  
15 They both came up with an excuse why they did not have it. They did tell POWELL that  
16 they were 18 and 20 years old.

17 12. While at the motel, POWELL posted prostitution advertisements on  
18 backpage.com of JF-1 and JF-2. JF-1 recalled that she had two prostitution dates at the  
19 motel. She earned approximately \$250 from the two dates. JF-1 gave approximately half  
20 of the money to POWELL but told him the money she gave was the entire earnings from  
21 the two dates. JF-1 recalled that JF-2 had one date at the motel as well.

22 13. After spending the night at Studio 6 Motel, POWELL took JF-1 and JF-2 to  
23 San Jose, California.<sup>3</sup> JF-1 stated they drove from the Seattle area to San Jose,  
24 California, in POWELL's car, a silver BMW. She recalled they stayed at the San Jose  
25

26 <sup>1</sup> JF-1's interviews occurred on September 9, 2014, September 10, 2014, and March 31, 2015. JF-2's interviews  
27 occurred on September 2, 2014, and April 2, 2015. All of these interviews were recorded.

28 <sup>2</sup> I am aware that it is not a defense to 18 USC Section 2423(a) that the defendant was ignorant of the victim's age.  
See *United States v. Taylor*, 239 F.3d 994, 997 (9<sup>th</sup> Cir. 2001).

<sup>3</sup> Initially, JF-1 reported that POWELL's girlfriend (subsequently identified as an adult female B.N.M.) went with  
them but in a subsequent interview she clarified that B.N.M. did not accompany them to California.

1 Airport Parking Hotel. POWELL got two rooms – one for him and a room for JF-1 and  
2 JF-2 to share.

3 14. Once they arrived in California, POWELL became more aggressive toward  
4 her and JF-2, demanding that they go out on the streets and prostitute. He told them they  
5 had to work because he was broke and warned them they would have to sleep outside  
6 unless they worked. The first night, POWELL drove JF-1 and JF-2 to the prostitution  
7 “track.”<sup>4</sup> While JF-1 and JF-2 were at the “track” POWELL drove around the area and  
8 kept watch of them. JF-1 and JF-2 had to stay at the track until 3 or 4 am. JF-1 stated  
9 she had two prostitution dates and made approximately \$140 which she gave to  
10 POWELL.

11 15. The second day, POWELL drove her and JF-2 back to the “track”. During  
12 this day/night, JF-1 had approximately three to four prostitution dates and made  
13 approximately \$250. JF-1 gave \$200 of her earnings to POWELL. The next morning,  
14 JF-1 woke up and discovered POWELL had left them. At that point, she called the police  
15 and was taken into protective custody.

16 16. I met and interviewed JF-2 on two occasions. In summary, JF-2 told me  
17 that she has lived in the Seattle area for over four (4) years. This was the second time she  
18 was forced into prostitution. JF-2 stated she met POWELL, whom she knew as “Fresh  
19 the P” or “Fresh” through her friend JF-1.

20 17. JF-2 stated that prior to being taken to California, POWELL took her to the  
21 Studio 6 Motel in Mountlake Terrace, Washington, and posted her in advertisements for  
22 commercial sex on backpage.com. JF-2 recalled POWELL posted her on August 21 or  
23 22, 2014. JF-2 stated that she had one prostitution date as a result of the backpage.com  
24 post and she made \$100.

25 18. The following day, JF-2 stated that she, JF-1, and POWELL drove to San  
26 Jose, California, and checked into the San Jose Airport Parking Hotel. JF-2 stated that  
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<sup>4</sup> “Track” is slang for the street where prostitutes walk on the street to find customers.

1 once they arrived in California POWELL became mean to her. POWELL told her, in  
2 essence, that she was not going home until she made him some money. JF-2 said that  
3 POWELL drove her and JF-1 out to First Street in San Jose, where she and JF-2 worked  
4 as prostitutes all day and into the early morning hours. According to JF-2, the first day,  
5 she had one customer and made only \$20 which she gave to POWELL. The next day,  
6 they went to a new motel closer to the track and POWELL again took them to the same  
7 area where they worked as prostitutes walking the street until 3 or 4 am.

8 19. The second night, JF-1 had a number of prostitution customers. She saw  
9 JF-1 give POWELL approximately \$150 to \$200 of prostitution earnings. JF-2 stated she  
10 got a lot of attention but did not have any customers. The next morning, she and JF-1  
11 woke up to find that POWELL had left them. Later, POWELL sent JF-1 a text message  
12 that stated "you ho's have been fired." JF-1 and JF-2 were subsequently contacted by the  
13 San Jose Police and taken into protective custody.

14 20. I obtained a copy of the San Jose Police report where JF-1 and JF-2 were  
15 taken into protective custody. The report indicates the room in which JF-1 and JF-2 were  
16 staying was rented by ROBERT RYAN POWELL with a date of birth of \*\*\*\*1981.

17 21. I also received JF-1's cellphone, a LG cellular phone that was taken from  
18 her when she was contacted by the San Jose Police. After obtaining JF-1's permission, I  
19 had the contents downloaded by Seattle Police Department using the cellebrite UFED  
20 program. I obtained several pictures which depicted "Fresh." I showed the photographs  
21 to JF-1 and JF-2 who both confirmed the person depicted was the pimp they knew as  
22 "Fresh." I had obtained a Nevada driver's license photograph of POWELL. Based upon  
23 a review of the two photographs, I believe the photograph which JF-1 and 2 identified as  
24 "Fresh" is POWELL.

25 22. Both JF-1 and JF-2 described POWELL's car as a recently purchased silver  
26 BMW. I learned that on August 24, 2014, the Oakland Police Department stopped and  
27 arrested POWELL who was driving a silver BMW. JF-1 had a photograph of  
28 POWELL's silver BMW on her cell phone.

1 23. I showed another photograph from the phone to both JF-1 and JF-2 who  
2 both identified the person as POWELL's girlfriend. Through subsequent investigation I  
3 was able to identify the person as AF-1.

4 24. On March 10, 2015, the Seattle Police Vice Unit arrested AF-1 during an  
5 undercover prostitution operation. AF-1 agreed to be interviewed. AF-1 stated that she  
6 knew "Fresh" and that his full name was ROBERT RYAN POWELL. AF-1 was shown  
7 a photograph of "Fresh" taken from JF-1's cell phone which she identified as POWELL.  
8 She also viewed POWELL's Nevada driver's license photograph and confirmed it was  
9 POWELL.

10 25. AF-1 stated that she met POWELL in January or early February 2014 when  
11 he contacted her through her backpage.com advertisement. POWELL recruited AF-1 to  
12 work for him as a prostitute. Between February through July 2014, POWELL took AF-1  
13 from Washington State to Las Vegas, Nevada to work as a prostitute. AF-1 recalled that  
14 in addition to Nevada, she accompanied POWELL to California, Idaho, and Arizona, to  
15 work as a prostitute for him.

16 26. AF-1 recalled that in August 2014, POWELL introduced her to two girls at  
17 a motel in Mountlake Terrace, Washington. POWELL told AF-1 that he was going to  
18 take the two girls to California, near Oakland, to work as prostitutes. I showed AF-1  
19 photographs of JF-1 and JF-2 and she confirmed they were the two girls that POWELL  
20 introduced to her.

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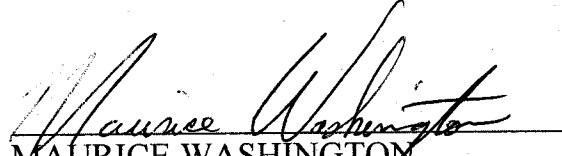
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1        27. Based on the above facts, I respectfully submit that there is probable cause  
2 to believe that ROBERT RYAN POWELL did knowingly and intentionally engage in  
3 transporting minors in interstate commerce for purposes of prostitution, in violation of  
4 Title 18, United States Code, Section 2423(a).

5  
6   
7 MAURICE WASHINGTON,  
8 Complainant  
9 Task Force Officer, FBI

10        Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
11 presence, the Court hereby finds that there is probable cause to believe the Defendant(s)  
12 committed the offenses set forth in the Complaint.

13        Dated this 11th day of June, 2015.

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16 BRIAN A. TSUCHIDA  
17 United States Magistrate Judge  
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